

LABATON SUCHAROW LLP

Thomas A. Dubbs
Louis Gottlieb
Carol C. Villegas
Jeffrey A. Dubbin (SBN 287199)
140 Broadway
New York, New York 10005

Lead Counsel to Lead Plaintiff and the Class

MICHELSON LAW GROUP

Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, California 94104

*Bankruptcy Counsel to Lead Plaintiff
and the Class*

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
One Lowenstein Drive
Roseland, New Jersey 07068

*Bankruptcy Counsel to Lead Plaintiff
and the Class*

(*additional counsel on Exhibit A*)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**AMENDED NOTICE OF SECURITIES LEAD
PLAINTIFF'S MOTION TO APPLY
BANKRUPTCY RULE 7023 TO CLASS
PROOF OF CLAIM**

Date: January 29, 2020
Time: 10:00 a.m. (Pacific Time)
Before: Hon. Dennis Montali,
United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, California 94102

Objection Deadline: January 14, 2020 at 4:00 p.m.
(Pacific Time)

1 **PLEASE TAKE FURTHER NOTICE** that on January 29, 2019, PG&E Corporation and
2 Pacific Gas and Electric Company, the debtors in possession (the “**Debtors**”) in the above-
3 captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief
4 under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United
5 States Bankruptcy Court for the Northern District of California (San Francisco Division) (the
6 “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold an omnibus
8 hearing on January 29, 2020 at 10:00 a.m. (Pacific Time) (the “**Omnibus Hearing**”) in the
9 courtroom of the Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th
10 Floor, 450 Golden Gate Avenue, San Francisco, California 94102.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters scheduled
12 for the Omnibus Hearing, the Bankruptcy Court is scheduled to hear *Securities Lead Plaintiff’s*
13 *Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim* (the “**Motion**”), which was filed
14 by Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”), the court-
15 appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation*
16 *Securities Litigation*, Case No. 18-03509 (N.D. Cal.), on December 9, 2019.

17 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Order Approving Stipulation
18 Regarding Scheduling With Respect to Securities Lead Plaintiff’s Motion to Apply Rule 7023 to
19 Class Proof of Claim [ECF No. 5042], entered on December 27, 2019 as ECF No. 5211, the
20 Debtors shall have until January 14, 2020 at 4:00 p.m. (Pacific) to file their objection, if any, to
21 the Motion. Oppositions or responses to the Motion must be in writing, filed with the Bankruptcy
22 Court, and served on the counsel for Lead Plaintiff at the above-referenced addresses so as to be
23 received by no later than January 14, 2020 at 4:00 p.m. (Pacific). Any oppositions or responses
24 must be filed and served on all “Standard Parties” as defined in, and in accordance with, the *Second*
25 *Amended Order Implementing Certain Notice and Case Management Procedures* entered on May
26 14, 2019 [ECF No. 1996] (the “**Case Management Order**”). Any relief requested in the Motion
27 may be granted without a hearing if no opposition is timely filed and served in accordance with
28 the Case Management Order. In deciding the Motion, the Court may consider any other document

1 filed in these Chapter 11 Cases and related Adversary Proceedings.

2 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
3 papers can be viewed and/or obtained: (i) by accessing the Court's website at
4 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
5 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime
6 Clerk LLC, at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
7 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
8 pginfo@primeclerk.com. Note that a PACER password is needed to access documents on the
9 Bankruptcy Court's website.

10 Dated: December 27, 2019

11 Respectfully submitted,

12 **LOWENSTEIN SANDLER LLP**
13 **MICHELSON LAW GROUP**

14 By: /s/ Randy Michelson
Randy Michelson (SBN 114095)

15 *Bankruptcy Counsel to Lead Plaintiff and the Class*

16 - and -

17 **LABATON SUCHAROW LLP**

18 *Lead Counsel to Lead Plaintiff and the Class*

19 - and -

20 **WAGSTAFFE, VON LOEWENFELDT, BUSCH**
21 **& RADWICK, LLP**

22 *Liaison Counsel for the Class*

23 - and -

24 **ROBBINS GELLER RUDMAN & DOWD LLP**

25 *Counsel for the Securities Act Plaintiffs*

26 - and -

27 **VANOVERBEKE, MICHAUD & TIMMONY,**
28 **P.C.**

Additional Counsel for the Securities Act Plaintiffs

EXHIBIT A
COUNSEL

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*Pro Hac Vice*)
Andrew Behlmann
Scott Cargill
Gabriel Olivera
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone 973-597-2500
Facsimile 973-597-2333
metkin@lowenstein.com
abehlmann@lowenstein.com

MICHELSON LAW GROUP

Randy Michelson, Esq. (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, CA 94104
Telephone 415-512-8600
Facsimile 415-512-8601
randy.michelson@michelsonlawgroup.com

Bankruptcy Counsel to Lead Plaintiff and the Class

LABATON SUCHAROW LLP

Thomas A. Dubbs
Louis Gottlieb
Carol C. Villegas
Jeffrey A. Dubbin (SBN 287199)
Aram Boghosian
140 Broadway
New York, New York 10005
Telephone 212-907-0700
tdubbs@labaton.com
lgottlieb@labaton.com
cvillegas@labaton.com
jdubbin@labaton.com
aboghosian@labaton.com

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH & RADWICK, LLP**

James M. Wagstaffe (SBN 95535)
Frank Busch (SBN 258288)
100 Pine Street, Suite 725
San Francisco, California 94111
Telephone 415-357-8900
wagstaffe@wvbrlaw.com
busch@wvbrlaw.com

Liaison Counsel for the Class

Lead Counsel to Lead Plaintiff and the Class

ROBBINS GELLER RUDMAN & DOWD LLP

Darren J. Robbins (SBN 168593)
Brian E. Cochran (SBN 286202)
655 West Broadway, Suite 1900
San Diego, California 92101
Telephone 619-231-1058
darrenr@rgrdlaw.com
bcochran@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP

Willow E. Radcliffe (SBN 200089)
Kenneth J. Black (SBN 291871)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, California 94104
Telephone 415-288-4545
willowr@rgrdlaw.com
kennyb@rgrdlaw.com

**VANOVERBEKE, MICHAUD &
TIMMONY, P.C.**

Thomas C. Michaud
79 Alfred Street
Detroit, Michigan 48201
Telephone 313-578-1200
tmichaud@vmtlaw.com

Additional Counsel for the Securities Act Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28